

**In the United States Court of Federal Claims
BID PROTEST**

CW GOVERNMENT TRAVEL, INC.)
A/K/A CWTSA TRAVEL,)
Plaintiff,) Case No. 21-1354 C
v.) Judge _____
THE UNITED STATES OF AMERICA,)
Defendant.)

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL
AND MOTION FOR A PROTECTIVE ORDER**

Plaintiff, CW Government Travel, Inc., a/k/a CWT Sato Travel (“CWT”), of Arlington, Virginia, through its undersigned counsel, respectfully requests that the United States Court of Federal Claims grant it leave to file its accompanying bid protest Complaint, Motion for a Temporary Restraining Order and Preliminary Injunction and accompanying Memorandum in Support of Motion for Temporary Restraining Order and Preliminary Injunction, under seal, and that the Court issue a protective order.

Plaintiff's bid protest complaint contains information that is subject to a protective order issued by the Government Accountability Office ("GAO") in the matter of *CW Government Travel, Inc.*, B-419193.1, .2, .4, .5, .6. Paragraph 8 of the Protective Order provides:

Protected material obtained under this protective order may be used, however, in abid protest filed with the United States Court of Federal Claims, without GAO's prior authorization, provided that the information is filed under seal with the Court, that the Court is informed of GAO's protective order, and that the Court is requested to issue its own protective order to cover the protected material.

In addition to complying with this requirement, CWT requests a protective order because information that will be included in the administrative record before this Court will contain

confidential and sensitive source selection material, including proprietary information of both CWT and the awardee, BCD Travel USA, LLC, which should not be released publicly. Therefore, in accordance with Appendix C, Rule 4 of the Rules of the Court of Federal Claims, Plaintiff has marked the Complaint, Motion for a Temporary Restraining Order and Preliminary Injunction and accompanying Memorandum in Support of Motion for Temporary Restraining Order and Preliminary Injunction, as proprietary and confidential, and is concurrently filing a redacted version of this document with the Court.

Dated: May 13, 2021

Respectfully submitted,

/s/ Lars E. Anderson

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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2021, a copy of foregoing was served via email on the following:

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